Ralph M: Stone Thomas G. Ciarlone, Jr. Amanda C. Scuder SHALOV STONE BONNER & ROCCO LLP 485 Seventh Avenue, Suite 1000 New York, New York 10018 (212) 239-4340 Fax (212) 239-4310

Attorneys for Movants and [Proposed] Lead Counsel for the Class

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ROBERT CORWIN, on behalf of himself and all others similarly situated,

Plaintiff,

v.

BERND R. SEIZINGER, MARTINE GEORGE, MARCEL ROSENCZWEIG and GPC BIOTECH AG,

Defendants.

ISTVAN TEMESFOI, on behalf of himself and all others similarly situated,

Plaintiff,

v.

GPC BIOTECH AG; BERND R. SEIZINGER; MARTINE GEORGE; and MARCEL ROSENCZWEIG,

Defendants.

CASE NO. 07 CV 6728

CASE NO. 07 CV 7016

**Document Filed Electronically** 

AUDREY DANG, Individually, and on behalf of all others similarly situated,

CASE NO. 07 CV 7476

Plaintiff,

v.

GPC BIOTECH AG; BERND R. SEIZINGER; MARTINE GEORGE; and MARCEL ROSENCZWEIG,

Defendants.

## Notice Of Motion For Consolidation, Appointment Of Lead Plaintiffs And Approval of Selection of Lead Counsel

PLEASE TAKE NOTICE that, upon the accompanying Affirmation of Ralph M. Stone, sworn to on September 24, 2007, the accompanying Memorandum of Law, and all other papers and prior proceedings had herein, the undersigned will move this Court, on a date and at a time to be determined by the Court, for an order, pursuant to Fed. R. Civ. P. 42(a) consolidating the above-captioned actions, and, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"): (i) appointing Istvan Temesfoi, Stefan Ganswindt, Tobias Wenk, Elmar Rempel, and Matthias Lenardt (the "Temesfoi Lead Plaintiff Group") as Lead Plaintiffs in the above-captioned actions and in any related actions; and (ii) approving their selection of Shalov Stone Bonner & Rocco LLP as Lead Counsel.

DATED: September 24, 2007

Respectfully submitted,

SHALOV STONE BONNER & ROCCO LLP

By: /s/ Ralph M. Stone

Ralph M. Stone Thomas G. Ciarlone, Jr. Amanda C. Scuder

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